

# EXHIBIT A



# KIRBY MCINERNEY LLP

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## BY HAND & FEDEX

March 21, 2008

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1211 Avenue of the Americas  
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Re: *The City of New York, et al. v. Abbott Labs, Inc., et al.*, MDL 1456;  
Plaintiffs' Medicaid claims data

### Counsel:

Enclosed is a CD which contains a true and complete copy of the City of New York and New York Counties' Medicaid claims data produced to us by the New York State Department of Health for all Designated FUL drugs. Claims data associated with plaintiffs' claims for all other drugs will be produced within 2 weeks.

Plaintiffs produce this data subject to and without waiver of the objections asserted in each Counties' Responses to Defendants' First Set of Document Requests. This production is designated as "Confidential" pursuant to the operative Protective Order in the MDL.

The enclosed production includes data from the following fields:

- NDC
- Drug name
- Date dispensed
- Date paid
- Provider number
- Quantity
- Claim status
- Unique claim identifier
- Amount Paid by New York State Medicaid
- Dual eligible flag
- Other insurance amount paid.

Data from the fields "Provider name" and "Provider address" are also enclosed, but in a separate file.

The State has informed us that data from the following fields is also available, but will take additional time. Please let us know if you want this data.

- Medicare allowed amount
- Medicare paid amount

The State has informed us that data from the following fields is available, but not reliable:

- Copayment/coinsurance amount
- Other insurance coverage type
- Other insurance payor name

The State has informed us that the following data fields are not available:

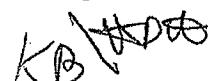
- Payment basis
- Dispensing fee
- Reason denied or adjusted
- HCPCS code
- Place of service
- Ingredient cost

You also requested data from the following fields:

- Allowed amount
- Billed charge
- Drug administration service reimbursement

These fields are not used in the State Department of Health database.

Best regards,



Kathryn J. Bale

Enclosures

cc: Joanne M. Cicala, Esq. (w/out enclosures)

All defense counsel via Lexis/Nexis (w/out enclosures)